

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION**

**TROY H. BRADFORD and
GLORIA BRADFORD, Individually
and as Class Representatives on Behalf
Of All Similarly Situated Persons;
and BOOKS, ETC., By and Through
TROY and GLORIA BRADFORD,
Class Representatives on Behalf of
All Those Similarly Situated**

Plaintiffs

VS.

**UNION PACIFIC RAILROAD
COMPANY, a Delaware Corp.
and J.L. GORDAN, an Arkansas
Resident**

Defendants

Cause No. 4:05-cv-4075

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS
TO FILE RESPONSES TO PLAINTIFFS' MOTION FOR LEAVE TO FILE SECOND
AMENDED CLASS ACTION COMPLAINT AND
PLAINTIFFS' MOTION TO REMAND TO MILLER COUNTY, ARKANSAS**

COME NOW Defendants Union Pacific Railroad Company and J. L. Gordon, and for their Unopposed Motion for Extension of Time to File Responses to Plaintiffs' Motion for Leave to File Second Amended Class Action Complaint and Plaintiffs' Motion to Remand to Miller County, Arkansas, would state as follows:

1. On November 14, 2005, Plaintiffs filed their Motion for Leave to File Second Amended Class Action Complaint (9) in this action.

2. On November 14, 2005, Plaintiffs filed their Motion to Remand to Miller County, Arkansas (10) in this action.

3. Defendants are in need of additional time to prepare and file their responses to Plaintiffs' Motions.

4. Plaintiffs have agreed to the relief requested in this motion and to an extension of time for filing Defendants' Responses to both of Plaintiffs' Motions set forth above, to and including December 5, 2005.

WHEREFORE, PREMISES CONSIDERED, Defendants Union Pacific Railroad Company and J. L. Gordon respectfully request this Court to grant this Unopposed Motion for Extension of Time to file Responses to Plaintiffs' Motion for Leave to File Second Amended Class Action Complaint and Plaintiffs' Motion to Remand to Miller County, Arkansas, to and including December 5, 2005, and for such further relief as the Court shall deem appropriate.

Respectfully submitted,

/s/ Sean F. Rommel

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all known counsel of record in the above action by electronic filing on this 23rd day of November, 2005.

/s/ Sean F. Rommel _____
Sean F. Rommel